#### UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

	Souther	II DISHICI	of Oillo		
United States of America v.  ANTONIO WHITE  Defendant(s)		) ) ) )	Case No.	1:24-mj-298	
	CRIMIN	NAL CO	MPLAINT		
I, the complaina	ant in this case, state that the fo	ollowing i	s true to the bo	est of my knowledge and belief	•
On or about the date(s)	of 4/8/2024 - 4/18/202	24	_ in the count	ty of Hamilton	in the
Southern Distr	ict of Ohio	_ , the de	fendant(s) vio	plated:	
Code Section			Offense Description		
18 U.S.C. § 933	Trafficking in	Firearms			
This criminal co	omplaint is based on these facts	s:			
<b>☑</b> Continued or	n the attached sheet.			Complainant's signature	
			Wil	   <u>  Iliam D. Crayner, Special Agent</u>   Printed name and title	, ATF
Sworn to before me and via FaceTime vi	signed in my presence.			Trinea name una mie	
Date: <b>Apr 24, 2024</b>			- Haven L Lithout		
City and state:	Cincinnati, Ohio		United States Magistrate Judge		

#### **AFFIDAVIT**

Now comes William D. Crayner, Special Agent, Alcohol, Tobacco, Firearms, and Explosives (ATF), being duly sworn, deposes and states the following:

- 1. I am a Special Agent ("SA") with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and have been so employed since December 2018. As a part of my training with the ATF, I graduated from the Federal Law Enforcement Training Center, Criminal Investigator School, located in Glynco, Georgia. I also graduated from the ATF Special Agent Basic Training Academy, located in Glynco, Georgia, in June of 2019.
- 2. In my career with ATF, I have been assigned to the Cincinnati Field

  Office in the Southern Judicial District of Ohio. Prior to my employment with ATF, I was a member of the United States Secret Service in Washington D.C. where I served as a member of the Uniformed Division under the Presidential Protective Division. I was employed in that capacity from July of 2010 to February of 2015. I was also a member of the Carmel Police Department in Carmel, IN from February 2015 to December of 2018. I was assigned to the Operations Division at the Carmel Police Department and took part in various criminal investigations during my tenure. I have received additional training in several areas of law enforcement, including but not limited to gang investigations, narcotics interdiction and investigation, and firearms interdiction and investigation. I am also a graduate of Purdue University where I received a bachelor's degree in law and Society in 2008.I have received training in narcotics, gang, firearms, and explosives investigative techniques, as well as received training in electronic surveillance methods. I have participated in numerous investigations involving the illegal possession of

firearms, explosives and firearms related violent crime. I have also been involved in the investigation of several National Integrated Ballistics Network (NIBIN) NIBIN<sup>1</sup> leads related to violent crimes in Cincinnati, Ohio that were committed by known and unknown person(s). I am also familiar with the Federal Explosives Law and Regulations, including the Safe Explosives Act of 2002.

- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrants and does not set forth all of my knowledge about this matter.
- 4. This affidavit is submitted in support of an application for criminal complaint against, and arrest warrant for, Antonio WHITE. Based on the information stated below, I submit that there is probable cause to believe that on or about April 8, 2024, through April 18, 2024, WHITE trafficked and conspired to traffic in firearms in violation of 18 U.S.C. § 933 Trafficking in Firearms, in the Southern District of Ohio.

<sup>&</sup>lt;sup>1</sup> The National Integrated Ballistics Network (NIBIN) is a nationwide data network administered by the Bureau of Alcohol Tobacco and Firearms (ATF) that is comprised of 3-dimensional microscopic images of shell casings collected from crime scenes and test fire cartridges generated from recovered crime guns by law enforcement agencies across the country. These crime scene and test fire cartridges are collected, imaged, and submitted by the respective agencies for comparison to existing submissions contained within NIBIN. NIBIN correlates these submissions into likely matches that are subsequently verified by a NIBIN examiner, and subsequently subjected to a peer-review process, that determines multiple shell casings were generated by the same firearm which resulted in unique tooling marks and characteristics being transferred from the firearm to each shell casing. This information results in the publishment of an investigative lead showing commonalities between each crime event.

#### **PROBABLE CAUSE**

#### A. Introduction

- 5. The United States is conducting a criminal investigation of ANTONIO WHITE for suspected violations of 18 U.S.C. § 933 Trafficking in Firearms.
- 6. The following described purchases of evidence from WHITE were completed by ATF Undercover Special Agent 5342 (SA-5342), ATF Undercover Special Agent 6134 (SA-6134) and/or ATF Confidential Informant 31618 (CI-31618). Each of the purchases of evidence were audio/video recorded, and a copy of the recordings were entered into ATF Property. The ATF SAs and ATF CI utilized ATF-issued agent cashier funds for the purchase of evidence. An ATF undercover vehicle, equipped with audio/video recording equipment, was also used for each of the described purchased of evidence. Prior to each operation, CI-31618 was searched for contraband with negative results. Each of the purchases of evidence from WHITE occurred at addresses in Cincinnati, OH, which are located in the Southern District of Ohio.

## B. On April 8, 2024, ANTONIO WHITE sold a firearm and a bulletproof vest to ATF Undercover Special Agents and an ATF Confidential Informant.

- 7. On April 8, 2024, SA-5342, SA-6134, and CI-31618, purchased a firearm, ammunition, and a bulletproof vest from ANTONIO WHITE aka "Lil Extendo" for one thousand two hundred dollars (\$1,200.00). The purchase from WHITE on April 8, 2024, occurred at 2715 W. Galbraith Road, Cincinnati, OH.
- 8. At approximately 2:34 p.m., the audio/video recording equipment was activated to document the purchase of a firearm, ammunition, and a bulletproof vest from

WHITE<sup>2</sup>. SA-5342, SA-6134, and CI-31618 departed a predetermined staging location to meet with WHITE at 2415 W. Galbraith Road. Prior to meeting WHITE, it was determined the initial address was provided incorrectly. CI-31618 called WHITE at telephone number 859-462-7236, and the ATF SAs and ATF CI were redirected to 2715 W. Galbraith Road.

- 9. At approximately 2:42 p.m., the ATF SA's and ATF CI arrived at 2715 W. Galbraith Road and met WHITE, who was standing outside of the residence. WHITE approached the undercover vehicle and provided SA-5342 with a tan-colored bulletproof vest. WHITE told the ATF SAs and ATF CI that it was a Level III<sup>3</sup> vest. CI-31618 then provided WHITE with one thousand two hundred dollars (\$1,200.00) in ATF agent cashier funds. WHITE then removed a pistol from his front waistband and provided the firearm to CI-31618. WHITE told the ATF SAs and ATF CI that he would have another firearm for sale soon and all parties agreed to meet for the purchase of the firearm once WHITE had it in his possession.
- 10. The ATF SAs and ATF CI then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:

<sup>&</sup>lt;sup>2</sup> On April 8, 2024, at the time of this purchase, ANTONIO WHITE was known by his nickname of "Lil Extendo." WHITE was identified during a separate undercover purchase of evidence on April 10, 2024.

<sup>&</sup>lt;sup>3</sup> A Level III vest is "designed to stop rifle rounds, such as 7.62x51mm NATO and .223 Remington. It is commonly used by military personnel and law enforcement tactical units." Source: <a href="www.premierbodyarmor.com">www.premierbodyarmor.com</a>, https://premierbodyarmor.com/blogs/pba/understanding-body-armorratings#:~:text=Level%20III%20(Rifle)%3A&text=This%20armor%20is%20designed%20to%20stop%20rifle%20rounds%2C%20such%20as,designed%20to%20protect%20against%20NATO%20.

- a. Glock, Model 17Gen4, 9mm caliber pistol, Serial No. BBDD173
- b. Twenty-six rounds of ammunition
- c. Tan-colored bulletproof vest



# C. On April 9, 2024, ANTONIO WHITE sold a firearm to an ATF Undercover Special Agent and an ATF Confidential Informant.

- 11. On April 9, 2024, SA-6134 and CI-31618 purchased a firearm, firearm accessories, and ammunition from WHITE for one thousand one hundred dollars (\$1,100.00). The purchase of evidence occurred at 2715 W. Galbraith Road, Cincinnati, OH.
- 12. On April 9, 2024, prior to the activation of audio/video recording equipment, CI-31618 communicated with WHITE at the **859-462-7236** to confirm the anticipated purchase of a firearm from WHITE that day.

- 13. At approximately 12:53 p.m., the audio/video recording equipment was activated to document the purchase of a firearm, firearm accessories, and ammunition from WHITE. SA-6134 and CI-31618 departed from a predetermined staging location to meet with WHITE at 2715 W. Galbraith Road.
- 14. At approximate 1:00 p.m., SA-6134 and CI-31618, arrived at 2715 W. Galbraith Rd. to meet with WHITE. WHITE exited the residence while carrying a tancolored firearms box and an extended firearms magazine.



- 15. WHITE approached the ATF undercover vehicle and provided CI-31618 with the firearm, firearm box, and an extended magazine. CI-31618 then provided WHITE with one thousand one hundred dollars (\$1,100.00) in ATF agent cashier funds. WHITE then told CI-31618 that he could as get, "...an ARP, gold clip."
- 16. SA-6134 and CI-31618 then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:
  - a. Glock, Model 19X, Serial No. AFUB584

- b. Seventeen rounds of ammunition
- c. Two seventeen-round pistol magazine
- d. A fifty round pistol magazine



## D. Later on April 9, 2024, ANTONIO WHITE sold another firearm to an ATF Undercover Special Agent and an ATF Confidential Informant.

- 17. At a later time on April 9, 2024, SA-6134 and CI-31618 purchased a firearm and ammunition from WHITE for one thousand three hundred dollars (\$1,300.00). The purchase of evidence occurred at 6428 Witherby Avenue, Cincinnati, OH.
- 18. On April 9, 2024, prior to the activation of audio/video recording equipment, CI-31618 communicated with WHITE at the 859-462-7236 to confirm the anticipated purchase of a firearm from WHITE for the second time that day.
- 19. At approximately 4:57 p.m., the audio/video recording equipment was activated to document the purchase of a firearm and ammunition from WHITE. SA-6134

and CI-31618 departed from a predetermined staging location to meet with WHITE at 6428 Witherby Avenue.

- 20. At approximately 5:02 p.m, SA-6134 and CI-31618 arrived at 6428 Witherby Avenue and observed WHITE in the front yard of the residence. WHITE approached and entered the ATF undercover vehicle. Upon entering the ATF undercover vehicle, WHITE provided SA-6134 with a pistol. CI-31618 then provided WHITE with one thousand three hundred dollars (\$1,300.00) in ATF agent cashier funds. WHITE then said, "I'mma get you them switches too..." WHITE counted the money provided to him by CI-31618, and then asked SA-6134 for his/her telephone number in case CI-31618 was out of town. WHITE then exited the vehicle.
- 21. SA-6134 and CI-31618 then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:
  - a. Anderson, Model AM-15, multi-caliber pistol, Serial No.
     20181811
  - b. Twenty rounds of ammunition



### E. On April 10, 2024, ANTONIO WHITE sold two firearms to an ATF Undercover Special Agent and an ATF Confidential Informant.

- 22. On April 10, 2024, SA-6134 and CI-31618, purchased two firearms and ammunition from WHITE for one thousand five hundred dollars (\$1,500.00). The purchase of the firearms and ammunition occurred outside of a residence at 2715 W. Galbraith Road, Cincinnati, OH.
- 23. On April 10, 2024, prior to the activation of the audio/recording devices, CI-31618 communicated with WHITE using the 859-462-7236 to arrange for the purchase of firearms and ammunition.
- 24. At approximately 12:06 p.m., the audio/video recording equipment was activated to document the purchase the firearms and ammunition from WHITE. SA-6134 and CI-31618 departed from a predetermined staging location to meet WHITE at 2715 W. Galbraith Road.

- 25. At approximately 12:13 p.m., SA-6134 and CI-31618 arrived at 2715 W. Galbraith Road and WHITE was observed exiting the residence at this address. As WHITE approached the ATF undercover vehicle, he was observed carrying a brown paper bag, which he then gave to SA-6134 and CI-31618. SA-6134 reviewed the contents of the brown paper bag, which contained a pistol and a revolver. CI-31618 provided WHITE with one thousand five hundred dollars (\$1,500.00) in ATF agent cashier funds for the firearms.
- 26. At approximately 12:13 p.m., CI-31618 told WHITE the firearms were being taken to Chicago and told WHITE the serial numbers were being taken off.

  WHITE looked at CI-31618 and nodded in acknowledgment. CI-31618 also told WHITE that if he had something dirty, why not send it to Chicago. WHITE again nodded in acknowledgement. WHITE then exited the vehicle.
- 27. SA-6134 and CI-31618 departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:
  - a. HS Produkt, Model XD Elite, 9mm caliber pistol, Serial No.
     AT269521
  - Kimber, Model KGS Combat, .357 caliber revolver, Serial No.
     RV084026
  - c. Nineteen rounds of ammunition



### F. On April 11, 2024, ANTONIO WHITE sold a firearm to an ATF Undercover Special Agent and an ATF Confidential Informant.

- 28. On April 11, 2024, SA-5342 and SA-6134, purchased a firearm and ammunition from WHITE for nine hundred dollars (\$900.00). The purchase of evidence occurred at 3382 Washington Avenue, Cincinnati, OH.
- 29. At approximately 1:35 p.m., the audio/video recording equipment was activated to document the purchase of a firearm and ammunition from WHITE.
- 30. At approximately 1:41 p.m., UC-5342 received a telephone call from WHITE, using the 859-462-7236. WHITE asked UC-5342 about their arrival time and then directed the ATF SAs to an apartment building where they would meet. During this phone call, an unknown female used the 859-462-7236 and provided 3382 Washington Avenue as the address of the meeting location.
- 31. Shortly after arriving at 3382 Washington Avenue, WHITE walked from the apartment building at this address and approached the ATF undercover vehicle.

WHITE removed a firearm from his sweatshirt pocket and provided it to SA-5342. SA-5342 then gave WHITE nine hundred dollars (\$900.00) in ATF cashier funds for the firearm. WHITE then departed and said, "I'm goin' to hit y'all up."

- 32. The ATF SAs then departed from the area and returned to a predetermined staging location. The audio/video devices were deactivated, and the items purchased from WHITE were entered in ATF Property, which are further described as follows:
  - a. FN, Model 503, 9mm caliber pistol, Serial No. CV010573
  - b. Seven rounds of ammunition



- G. On April 15, 2024, ANTONIO WHITE sold two firearms and ammunition to two ATF Undercover Special Agents and an ATF Confidential Informant.
- 33. On April 15, 2024, SA-5342, ATF Undercover Special Agent 5015 (SA-5015), and CI-31618, purchased two firearms and ammunition from WHITE. The purchase of evidence occurred at the BP Gas Station located at 1550 Queen City Avenue, Cincinnati, OH.

- 34. Prior to the purchase of firearms, on April 11, 2024, and continuing through April 14, 2024, WHITE contacted SA-5342 from the 859-462-7236 multiple times. During these calls, WHITE, by means of FaceTime video calling, showed SA-5342 multiple firearms that we would sell SA-5342. During these calls SA-5342 and WHITE agreed to meet on April 15, 2024, to complete the purchase of the firearms.
- 35. On April 15, 2024, SA-5342 and WHITE, using the 859-462-7236, exchanged text messages and agreed to meet at the parking lot of the BP Gas Station, located at 1550 Queen City Avenue.
- 36. At approximately 5:21 p.m., the audio/video recording equipment was activated to document the purchase of firearms and ammunition from WHITE. SA-5342, SA-5015, and CI-31618, departed from a predetermined staging location to meet WHITE at the BP Gas Station located at 1550 Queen City Avenue.
- 37. At approximately 5:27 p.m., CI-31618 was called by WHITE from the 859-462-7236. WHITE told CI-31618 he could see the ATF undercover vehicle.
- 38. At approximately 5:28 p.m., WHITE approached the ATF undercover vehicle, while carrying a tan-colored bag. WHITE placed the bag on the rear seat of the ATF undercover vehicle and removed the firearms. CI-31618 then took the firearms and placed them on the front seat of the ATF undercover vehicle. SA-5342 and WHITE then discussed the price of the firearms, and SA-5342 then provided WHITE with one thousand nine hundred dollars (1,900.00) in ATF agent cashier funds. SA-5342 then spoke with WHITE about future firearm sales, and afterwards WHITE exited the ATF vehicle and left the area.

- 39. The ATF SAs and ATF CI then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:
  - Taurus, Model PT92AFS, 9mm caliber pistol, Serial No.
     TFP80515
  - b. Smith & Wesson, Model SD40, .40 caliber pistol, Serial No.
     FBP3444
  - c. Twenty-six rounds of ammunition



## H. On April 18, 2024, ANTONIO WHITE sold a firearm to two ATF Undercover Special Agents and an ATF Confidential Informant.

40. On April 18, 2024, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent (SA) #5342, hereafter referred to as UC-1 and SA #6134 (UC-2), both acting in an undercover capacity, accompanied by ATF

CI-31618 conducted a controlled purchase of a firearm for \$1000.00. This was a prearranged meeting for WHITE to provide the aforementioned firearm. UC-1 and CI-31618 arranged this transaction through cellular communication with WHITE on cellular number 859-462-7236. The firearm is fully described as a Ruger, Mod. 10/22, .22 cal. bearing serial number 800024. This transaction occurred at 3822 Washington Ave., Cincinnati, Ohio, in the Southern Judicial District of Ohio.

- 41. At approximately 1330 hours, UC-1 and CI-31618 placed a recorded call to WHITE to confirm the price and location of the firearm purchase. During the cellular call, WHITE indicated he no longer had the Glock pistol he agreed to sell. WHITE stated he had a "Chopper" and would sell it for \$1250.00. UC-1 and the CI negotiated a price of \$1000.00. WHITE accepted the offer and requested UC-1 and the CI to travel to Washington Ave. to complete the transaction. It should be noted that WHITE was referring to 3822 Washington Ave., Cincinnati, Ohio. UC-1 and UC-2 had previously met WHITE at this location.
- 42. At approximately 1417 hours, the electronic surveillance equipment was activated. UC-1, UC-2 and CI-31618 travelled to 3822 Washington Ave., Cincinnati, Ohio in an undercover vehicle (UCV).
- 43. At approximately 1421 hours, the UC's and CI arrived at the Auto Zone located at 3916 Harrison Ave., Cincinnati, Ohio. Upon arrival, UC-1 called WHITE and advised of our arrival. UC-1 explained to WHITE that the UCV could not enter the apartment complex parking lot however, we would park along

the roadway next to the entrance. WHITE agreed and stated he would meet UC-1 at this location.

44. A short time later, WHITE exited the apartment building with a suitcase. WHITE approached the UCV and handed the suitcase to UC-1. UC-1 placed the suitcase in the rear of the UCV and observed the aforementioned firearm inside. UC-1 took possession of the firearm and handed it to UC-2. UC-1 then handed WHITE \$1000.00 in ATF agent cashier funds. A short conversation occurred regarding additional firearms for sale. WHITE claimed his friend had a "Glock switch", but he kept changing his mind about selling it. WHITE stated he would contact UC-1 when he had more guns for sale. The UC's and CI exited the area and returned to the predetermined meeting location.



- 45. The ATF SAs and ATF CI then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WHITE were entered into ATF Property, which are further described as follows:
  - a. Ruger 10/22, .22 caliber rifle, Serial No. 80024



- I. ANTONIO WHITE called the Cincinnati Police Department 911 Dispatch Service three times between February 20, 2024, through March 1, 2024.
- 46. On April 10, 2024, Cincinnati Police Department (CPD) ATF Task Force Officer (TFO) Naomi Stewart queried the 859-462-7236 in the CPD 911 Dispatch Service Calls database. TFO Stewart identified three calls from the 859-462-7236, having occurred on February 20, 2024, February 21, 2024, and March 1, 2024.
- 47. TFO reviewed the calls made from the 859-462-7236 to the CPD 911 Dispatch Service. Collectively, during the calls on February 21, and March 1, 2024, the caller identified himself as "Antonio White" and provide his date of birth as September 14, 2005.
- 48. On April 10, 2024, TFO Stewart queried the Ohio Law Enforcement Gateway (OHLEG) database for information related to "Antonio White" with a date of birth of September 14, 2005. TFO Stewart identified ANTONIO WHITE, with DOB September 14, 2005, and SSN XXX-XX-2090.



49. On April 10, 2024, SA-5342 and SA-6134 reviewed the photograph of WHITE and confirmed it was the same individual that had been selling firearms to them in an undercover capacity from April 8, 2024, through April 10, 2024.

#### J. ANTONIO WHITE told and ATF Confidential Informant his name was "Antonio White."

- 50. On April 10, 2024, during the purchase of two firearms from WHITE, SA-6134 provided WHITE with a fictitious employment application for the purpose of obtaining his identifying information.
- 51. After the conclusion of the purchase of firearms on April 10, 2024, during an unrecorded call, WHITE called CI-31618 from the 859-462-7236. CI-31618 said during this phone call WHITE provided his name as "Antonio White."
  - K. ANTONIO WHITE is not currently a Federal Firearms Licensee.
- 52. On April 19, 2024, ATF Industry Operations Area Supervisor (AS)
  William Halusek queried ATF databases to determine if WHITE is a current Federal

Firearm Licensee (FFL); was a former FFL; or has a pending application to become an FFL. AS Halusek determined that WHITE is not a pending, current, or former FFL.

53. Based on the foregoing, I believe there is probable cause to show that WHITE trafficked in firearms in violation of 18 U.S.C. § 933 – Trafficking in Firearms in the Southern District of Ohio.

William D. Crayner

Special Agent

Bureau of Alcohol, Tobacco, Firearms &

**Explosives** 

Subscribed and sworn to before me this 24 day of April 2024

United States Magistrate Judge